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Attorney for Petitioner
KEITH NESBITT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIN JIN ZHAO,

Defendant.

and

KEITH NESBIT,

Claimant.

Case No. CR 21-cr-00181 VC

**STIPULATION AND ~~PROSED~~ ORDER
TO CONTINUE TIME FOR FILING
PETITION FOR ANCILLARY
PROCEEDING**

Claimant Keith Nesbitt, by and through his counsel, and the United States, by and through undersigned counsel, hereby stipulate and agree as follows:

Claimant has indicated that he may file a petition for an ancillary proceeding with respect to the property named in the amended motion for forfeiture. See Dkt. No. 73. The Court has granted two prior 30 day extensions between the parties allowing potential claimant Nesbit to file a claim as late as August 18, 2023. Dkt. No. 82, 85.

1 The government and potential claimant Nesbitt agree that additional time is needed to discuss the
2 case, including any proposed resolution as well as questions of discovery. See Fed. R. Crim. P. 32.2(c);
3 21 U.S.C. §§ 853(m), (n). To that end, the parties stipulate and agree that the deadline for claimant
4 Nesbitt's time to file a petition for an ancillary proceeding may be extended to September 18, 2023,
5 subject to the approval of the Court.
6

7 **SO STIPULATED.**

8 Respectfully submitted,

9 ISMAEL RAMSEY
10 United States Attorney

11 DATED: August 18, 2023

12 /S/
CHRIS KALTSIS
13 Assistant U.S. Attorney

14 DATED: August 18, 2023

15 /S/
ERIK BABCOCK
16 Attorney for Keith Nesbitt

17
18
19 **PROPOSED ORDER**

20 Good cause appearing, **IT IS SO ORDERED.**

21
22 DATED: 8/22/2023

23 
HONORABLE VINCE CHHABRIA
24 United States District Judge
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